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1999-5401

Date: 7/21/99 11:42 AM  
Sender: <Steve.Rife@HorizonAir.com>  
To: 9-NPRM-CMTS  
Priority: Normal  
Subject: Rules Docket FAA-19993401 - 29

Horizon Air would like to submit comments to Docket No. FAA-1999-5401;  
Notice No. 99-02.

I would appreciate it if you could please acknowledge receipt.



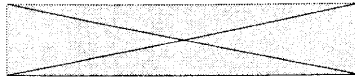
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OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET



*Horizon Air*

8070 NE Airtrans Way . Portland, OR 97218

July 21, 1999

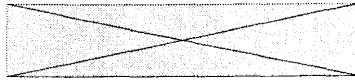
U. S. Department of Transportation Dockets  
Docket No . FAA-1999-5401  
400 Seventh St. SW.  
Room Plaza 401  
Washington, DC 20590

Dear Sirs:

Horizon Air would like comments to the proposed Rule Docket FAA-1999-5401. Horizon is the operator of a fleet of twenty-two Fokker F-28 Mk4000 aircraft and several deHavilland Dash 8-100 which would be affected by this rule. The Fokker aircraft have Supplemental Structural Inspection Program mandated by AD 93-13-04 Amendment 39-6444. Fokker has responded to our question whether this program meets the intent of the new regulations by stating that they had not had the opportunity to review the new regulations but expected that the F-28 SIP Program fully meets these guidelines. Although Horizon is not affected with the development of a damage tolerant inspection program, we feel that the implementation of these requirements on any additional aircraft types should be handled by individual AD's for each aircraft type. As an aircraft operator, we are totally dependent on the aircraft manufacturer to produce the data required and would not want to be regulated by a new FAR and not know whether acceptable data will available in time, or ever be available.

The intent of the regulatory process should be to create regulations which foster compliance rather than create a tangle of regulations and layer upon layer of Airworthiness Directives and rules which require a lawyer to decipher. The F-28 has damage tolerant inspections mandated by AD 93-13-04 which are in some cases superceded by other AD's which mandate terminating action modifications at different intervals than specified in AD 93-13-04. These items were required to be put into our maintenance program and our reviewed by FAA and DOD audits of our airline. Now, a change to the FAR's is proposed which will require review of each aircraft not as a 'fleet' but seeks to impose oversight on each individual aircraft as if it is a unique situation. We are totally opposed to this concept.

Horizon Air tracks checks and inspections on its aircraft by a computer tracking system. As each aircraft is added to the Operations Specifications they are loaded into the computer tracking system to meet all the inspections, checks, hard time requirements, AD's ,etc., as any of the other aircraft in that fleet type. Any items which have records which indicate a requirement has been previously satisfied is shown complied with and the



compliance date information loaded into the computer. Reviewing the records for any one serial number is much the same as for any other aircraft in the fleet. If the item has been set up correctly, it should be correct for all aircraft. If it is missing or otherwise incorrect, it will likewise be incorrect on all aircraft. This is typical to the methods employed at many other airlines for tracking of maintenance requirements.

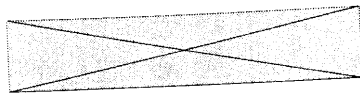
This proposed rule would establish 100% verification of each aircraft status. This is expensive, time consuming and unlikely to enhance the level of safety. For operators with large aging fleets this would end up being a continuous process, one aircraft after another. Most audit programs intend to sample the fleet, and only require additional review when problems are encountered. For the reason stated above, inspection of any one of our aircraft within a fleet type are likely to produce the same results as any other aircraft in that fleet type. Therefore, we feel strongly that the program should be a fleet sampling program most likely starting with the oldest aircraft within a fleet type with repeat program inspection every five years on a different aircraft within that fleet type. It is the operator program of compliance that is critical to the results on any individual aircraft.

In addition, these inspections are to include review of Airworthiness Directives, Corrosion Prevention and Control Programs, a list of major structural alterations and a report of major structural repairs and the current inspection status for those repairs. Several of these items have a very tenuous connection to the damage tolerance inspections and should be removed from the inspection review. Also, several years ago there had been considerable activity on a repair assessment program for elements of damage tolerance. Since then there has not been regulatory action on review of repairs for the F-28. It would be inappropriate to review repairs for damage tolerance inspections when the requirement for that type of repair has not been established.

Horizon hopes that you will take our comments into consideration when issuing this rule. The objective should be to enhance and verify the safety of aging aircraft and not to create a bureaucracy of inspections that diverts resources away from the intended purpose of maintaining the aircraft. It is our opinion that this objective can be met with a sampling program which shows that the air carrier has the programs and resources devoted to damage tolerance inspections that can be verified by a sample inspection of one aircraft per fleet type at a five year interval.

Sincerely,

Steven H. Rife  
Director of Engineering



Cc: Norm Grant